

IN IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

DAT QUOC NGUYEN,

and

TRIEU NGHI NGUYEN HOANG

Defendants.

Case No. 1:20-mj-241

UNDER SEAL

**AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Donald August Mockenhaupt, being duly sworn, depose and state as follows:

Agent Background

1. I am a duly appointed Special Agent of the Federal Bureau of Investigation (“FBI”) and have been employed as such since February 2002. I am currently assigned to the Washington (D.C.) Field Office, Northern Virginia Resident Agency. I am on a squad that investigates darknet related narcotics trafficking and I have been assigned to this squad since February 2019. Since August 2004, the vast majority of my investigative assignments have been narcotics related cases.

2. As a Special Agent, I have received extensive training in the enforcement of the criminal laws of the United States, as well as extensive training in criminal investigations. I have participated in numerous investigations involving unlawful narcotics distribution. During my participation in these investigations, I have been involved in the application for and execution of many arrest and search warrants for narcotics related offenses, resulting in the prosecution and

conviction of numerous individuals and the seizure of illegal drugs, illegal drug proceeds, and other evidence of criminal activity. As a narcotics investigator, I have interviewed many individuals involved in drug trafficking and have obtained information from them regarding the acquisition, sale, importation, manufacture, and distribution of controlled substances. Through my training and experience, I am familiar with the actions, habits, traits, methods, and terminology utilized by traffickers of controlled dangerous substances.

3. I am submitting this affidavit in support of arrest warrants and a criminal complaint charging the defendants, DAT QUOC NGUYEN and TRIEU NGHI NGUYEN HOANG, with conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

4. This affidavit does not contain every fact known to me regarding this investigation, but rather contains information necessary to demonstrate probable cause in support of the above-referenced criminal complaint and arrest warrants. All information contained in this affidavit is either personally known to me, has been related to me by other law enforcement officers, or has been related to me through reports, records or documents gathered during this investigation.

Initiation of Investigation

5. The United States, including the FBI, the U.S. Postal Inspection Service, the Fairfax County Police Department, the Drug Enforcement Administration, and the Food and Drug Administration (“FDA”) Office of Criminal Investigations, is conducting a criminal investigation of a darknet market (“DM”) vendor that operates using the moniker “addy4cheap.” A DM is a hidden commercial website that operates on a portion of the internet that is often

referred to as the TOR network, darkweb, or darknet. A DM operates as a black market, selling or brokering transactions involving legal products as well as drugs, weapons, counterfeit currency, stolen credit card details, forged documents, unlicensed pharmaceuticals, steroids, and other illicit goods.

6. In August 2019, Darknet Opioid Task Force FBI agents interviewed an individual residing in Fairfax County, Virginia within the Eastern District of Virginia who was suspected of being a darknet drug recipient. The individual is referred to herein in the masculine, regardless of true gender. The individual stated that he had on multiple occasions purchased Adderall through a DM known as the Empire Market from a vendor using the moniker addy4cheap. He did not think that the pills that he received were pharmaceutical grade as he had a prescription for Adderall and the tablets from addy4cheap were different from those that he had been prescribed. The individual stated that he received the tablets via U.S. Mail and that the return address on the packages from addy4cheap was in Fairfax, Virginia. The individual provided agents with the tracking number from his most recent purchase from addy4cheap on the Empire Market.

7. A review of U.S. Postal Service (“USPS”) business records indicated that the aforementioned individual had received three packages that were consistent with his description of the packages that he stated he had received from addy4cheap. All three parcels were shipped via USPS First Class Mail, contained tracking numbers, and bore the sender name “TXPRESS” with a return address in Fairfax County, Virginia. The records also indicated that at least one of the packages mailed to the individual was deposited at an external blue USPS collection box at the Chantilly Post Office in Chantilly, Virginia, located within the Eastern District of Virginia.

Addy4cheap's Vendor Accounts

8. During the course of this investigation, investigators reviewed darknet marketplaces and observed vendor accounts with the moniker addy4cheap offering drugs for sale on the Empire Market and Cryptonia. On both of these DMs, the vendor using the addy4cheap moniker advertised the sale of Adderall. Addy4cheap offered Adderall for sale on the Empire Market and Cryptonia for quantities ranging from one to over 1000 tablets. The price for one tablet was listed at \$12 with the price per tablet decreasing if you purchase more. Addy4cheap scaled the prices such that the price per tablet is \$8 if you purchase 1,000 tablets or more.

9. Customers on the Empire Market have the ability, but are not required, to leave a review of any product that they purchase on the relevant vendor's profile. As of December 4, 2019, the vendor using the moniker addy4cheap on the Empire Market had 2,558 reviews which consisted of 2,512 positive reviews, 25 neutral reviews, and 21 negative reviews. As an investigator, this indicates to me that the vendor using the addy4cheap moniker fulfilled at least 2,558 orders through the Empire Market. It is noted that the Empire Market lists addy4cheap as becoming a member of the DM on May 24, 2019. Therefore, between May 24, 2019 and December 4, 2019, addy4cheap appears to have executed at least 2,558 reviewed transactions. I suspect that the actual number of transactions for the sale of illegal narcotics by addy4cheap on the Empire Market exceeded 2,558 because customers are not required to leave a review. I also observed several negative reviews left for the vendor addy4cheap on the Empire Market. Some examples of the negative reviews are as follows: (1) "Tested positive for meth with simon a/b test," (2) "Not Adderall. Pressed pills. Tested positive for meth," (3) "Dishonest vendor. Says its authentic adderall and sends meth and sugar pressed into an "adderall" shape. Took this to study and ended up not sleeping for two days. It sucked. Do not buy," and (4) "I tested the pills and

they contain Meth. I was pretty upset since he advertised them as 100% authentic. I messaged him and he said the most he could offer me was a 15% discount. Just beware buyer these are Meth pills!"

10. On November 7, 2019, I reviewed the addy4cheap vendor profile on Cryptonia. The profile indicated that addy4cheap had conducted 140 transactions and has been a member of the DM since June 29, 2019. I also reviewed the language in the terms and conditions and the refunds and dispute sections of the addy4cheap profile. That language was identical on addy4cheap's profile on both the Empire Market and Cryptonia.

Undercover Drug Purchases From Addy4cheap

11. Beginning in late August 2019, investigators began to conduct undercover drug purchases from addy4cheap via the Empire Market. Later in the investigation, investigators made undercover purchases from addy4cheap on Cryptonia as well. To initiate the transactions, the investigators logged into their undercover account on the Empire Market or Cryptonia and placed their orders with addy4cheap. The undercover investigators paid for the suspected narcotics with cryptocurrency obtained with official government funds. The suspected narcotics were then sent to the investigators via First Class Mail and the tablets were received several days after the undercover investigator ordered them. The below table lists the undercover purchases from addy4cheap. The table denotes the following: (1) the date that the undercover purchase was initiated, (2) the DM utilized by the undercover investigators, (3) the number of tablets ordered in that specific transaction, (4) the address of the general area of where the undercover investigator designated the drugs to be shipped to and (5) the return name on the envelope. The return name is also commonly referred to as the sender's name.

Date Ordered	DM	Number of Tablets	Location Mailed To	Return Name on Envelope
8/24/2019	Empire	11	Fairfax County, VA	TXPRESS
8/28/2019	Empire	20	Prince William County, VA	TXPRESS
9/1/2019	Empire	10	Fairfax County, VA	TRX Express
9/5/2019	Empire	16	Prince William County, VA	TRX Express
9/12/2019	Cryptonia	20	Loudoun County, VA	TRX Express
9/23/2019	Cryptonia	40	Loudoun County, VA	SMART BARGAIN
9/24/2019	Empire	10	Fairfax County, VA	TRX Express
9/30/2019	Empire	20	Prince William County, VA	TRX Express
10/1/2019	Cryptonia	20	Providence, RI	TRX Express
N/A ¹	Cryptonia	20	Providence, RI	TRX Express
10/9/2019	Empire	30	Anne Arundel County, MD	JUNGLE CO
10/15/2019	Empire	200	Prince William County, VA	RAISON EXPRESS
10/21/2019	Cryptonia	20	Providence, RI	RAISON EXPRESS
10/22/2019	Cryptonia	20	Loudoun County, VA	RAISON EXPRESS
10/29/2019	Cryptonia	100	Loudoun County, VA	RAISON EXPRESS
11/5/2019	Empire	Ordered 20, Received 24	Prince William County, VA	RAISON EXPRESS
11/6/2019	Cryptonia	20	Prince William County, VA	RAISON EXPRESS

¹ It is noted that there is no ordered date listed for one of the undercover drug purchases. The undercover investigator ordered 20 tablets on October 1, 2019 and asked for the tablets to be mailed to a Providence, Rhode Island address. The shipment arrived and a second package was mailed shortly thereafter with the same quantity of tablets. Investigators believe that this was a mistake made by addy4cheap because there was no payment for this second package.

Date Ordered	DM	Number of Tablets	Location Mailed To	Return Name on Envelope
11/12/2019	Cryptonia	20	Prince William County, VA	RAISON EXPRESS
11/19/2019	Empire	100	Prince William County, VA	RAISON EXPRESS
11/21/2019	Empire	19	Prince William County, VA	RAISON EXPRESS
11/27/2019	Empire Market	27	Anne Arundel County, MD	RAISON EXPRESS

12. All of the aforementioned tablets received from addy4cheap are peach in color and resemble those advertised on addy4cheap's vendor pages on the Empire Market and Cryptonia. Consistent with the advertisements by addy4cheap on the Empire Market and Cryptonia, upon visual inspection, investigators observed markings on the tablets of "A D" and "30" which is consistent with known markings for 30 milligram Adderall tablets, however, the purchased tablets appeared to be pressed. Tablets that are pressed are not produced by pharmaceutical companies, rather they are produced by black market drug traffickers.

13. All of the aforementioned tablets were shipped in padded envelopes or 'bubble mailers' via U.S. Mail, the method of shipment available through addy4cheap. The padded envelopes were manila or light gray. With one exception, all of the tablets were in small clear re-sealable bags which were within a sealed black mylar bag. The return names and addresses on the packages changed throughout the investigation, but all of the return addresses were locations in Fairfax County, Virginia. Most of the packages also contained one or two folded pieces of paper. Three of the packages from "RAISON EXPRESS" contained empty raisin boxes where the tablets were inside clear re-sealable bags within the raisin boxes. I know that individuals involved in selling drugs via the darknet try to disguise their drug shipments in order to avoid detection by law enforcement.

14. With the exception of the tablets ordered on November 19 and 21, 2019 which are pending laboratory analysis, the aforementioned tablets were analyzed by the Commonwealth of Virginia Department of Forensic Science, the DEA Mid-Atlantic Laboratory or the FDA Forensic Chemistry Center. It was determined that the analyzed tablets contained methamphetamine, a Schedule II controlled substance. Investigators weighed the tablets upon receipt and each individual tablet received through the undercover buys weighed approximately 0.35 grams. The total number of tablets obtained from undercover purchases was 767 for an estimated total of 268 grams.

15. The controlled purchases described above involving the addy4cheap moniker were conducted using Bitcoin, a type of digital cryptocurrency. Functionally, it serves the same purpose as United States dollars, except that it is not tied to a central bank and is not regulated by a government body such as a treasury. Bitcoin transactions take place entirely online and offer a degree of anonymity to users. Bitcoin transactions are securely recorded in a public ledger called a blockchain. Based on my training and experience, individuals who are involved in criminal activity over the darkweb often purchase items in Bitcoin to conceal the true nature of the funds from law enforcement.

16. Co-conspirators of the defendants were observed by investigators between August 2019 and December 2019 depositing numerous packages containing illegal narcotics in association with the darknet vendor addy4cheap into USPS collection boxes. The co-conspirators used several different collection boxes, but all of them were located within the Eastern District of Virginia. These individuals repeatedly mailed packages that were identical in many respects to drug laden packages that were obtained through undercover drug purchases. The co-conspirators took measures to conceal their activity, including: (1) mailing packages that

did not have their true names and addresses listed as the return information, (2) utilizing multiple USPS collection boxes on the same day to deposit packages, (3) handling the packages in a manner to avoid leaving fingerprints and (4) operating in the late evening or early morning hours.

17. Analysis of the customer reviews for addy4cheap on the Empire Market was conducted on December 10, 2019 for sales beginning in early June 2019. The data showed that addy4cheap had reviews for sales for over 44,000 pills for a total cost exceeding \$482,000.

18. Pursuant to a search warrant authorized by the Honorable Ivan D. Davis, on December 9, 2019, investigators searched the residence of TYLER PHAM and another one of the defendants' co-conspirators, LIEN KIM THI PHAN. In a desk drawer that also contained TYLER PHAM's license, investigators found 95 peach colored tablets and 100 tablets resembling MDMA. The tablets were later analyzed by the DEA Mid-Atlantic Laboratory and found to contain methamphetamine and 3,4 Methyl enedioxymethamphetamine (MDMA), respectively. The peach-colored tablets resembled those advertised on addy4cheap's vendor pages as well as the tablets obtained through the above-outlined controlled purchases. Both sets of tablets were inside black mylar bags which is packaging material consistent with that used in most of the controlled buys described in further detail above. In addition to the tablets, investigators observed a note that read "Get crypto money \$" tacked on a bulletin board in the office area as well as a money counter and a scale.

19. Also pursuant to a search warrant executed on December 9, 2019 authorized by the Honorable Ivan D. Davis, investigators searched the residence of another one of the defendants' co-conspirators, HON LAM LUK, which he previously to share with DUONG THUY NGUYEN, another of the defendants' co-conspirators. During the search of LUK's

residence, investigators seized over 6,000 peach tablets consistent with those advertised on addy4cheap's vendor pages and obtained through controlled purchases which weighed approximately two kilograms. In addition to the suspected narcotics, investigators seized packaging material consistent with the undercover drug purchases to include padded envelopes and boxes of raisins.

20. Since the December 2019 search warrants were executed, four of the defendants' co-conspirators have pleaded guilty in this District for their involvement in the conspiracy.

Electronic Communications

21. Pursuant to the search warrants executed in December 2019, investigators seized several electronic devices. The seized devices contain communications between the defendants and co-conspirators in which DAT QUOC NGUYEN used the number 571-***-0187 and TRIEU NGHI NGUYEN HOANG used the number 703-***-5836. These phone numbers are subscribed to the respective defendants at addresses in northern Virginia.

22. A review of seized devices revealed that, on July 5, 2019, TRIEU NGHI NGUYEN HOANG and PHAN were involved in a Facebook Messenger chat. The two parties had casual conversation until PHAN stated, "Oh pls tell dat to send in the order at night," "On Thursday-sat." TRIEU NGHI NGUYEN HOANG replied, "He did," "Send the label." PHAN replied, "Just finished with my client[.] Now run home to do orders." Later in the conversation, PHAN stated, "Is it possible for tomorrow's order send in tonight." TRIEU NGHI NGUYEN HOANG replied, "Okay let me call him now." PHAN stated, "I'm working tomorrow[.] I can do it tonight and Tyler send it out tomorrow." TRIEU NGHI NGUYEN HOANG responded, "Okay np today is done," "The order for tomorrow is coming note time," "So u can do it Saturday nite." PHAN stated, "Yeah already sent out today's ordered." Later in the

conversation, PHAN asked, “What’s the deadline time for tomorrow’s mail.” TRIEU NGHI NGUYEN HOANG replied, “No rush,” “Sunday no open,” “So just do it then drop off anytime,” “Sunday.” PHAN replied, “Ok.”

23. Based on a review of the data downloaded from one of the seized cellular telephones, in October 2019 DAT QUOC NGUYEN was involved in a WhatsApp group chat involving PHAN, LUK, and SON NGUYEN, another co-conspirator. During the chat, SON NGUYEN discussed an unsatisfied customer and at some point wrote, “OK let me check if he’s also ordering from me for weed.” Later in the conversation, DAT QUOC NGUYEN wrote in several transmissions, “Son u should separate ur weed and ur addy,” “Don’t do them together,” “Do weed at night,” “Do addy in the morning,” “Our username is not addy4cheap1,” “This nikka is bothering me on empire too,” “I mean not empire but on wickr” and “I think he is messaging every vendor to get free shit.” Several days later but within the same group chat, PHAN wrote, “The company owes me 3k[,] \$2500 for the months of sept[,] \$500 for the 8 days of answering wickr[,] Thank you for your business.” SON NGUYEN replied, “The fuckkkkkkkkkkk out of hurrrrr.” PHAN replied, “Where is my sept?” SON NGUYEN responded, “We filed chap 11.” DAT QUOC NGUYEN then wrote, “Already paid tyler the 2500 for sepy.” Later in the day, SON NGUYEN wrote, “We no longer use wickr. Everything must be done on site.” DAT QUOC NGUYEN responded, “Why u change it.” SON NGUYEN replied, “Cuz Tyler and you won’t give him the password.”

24. Also in October 2019, DAT QUOC NGUYEN was involved in another WhatsApp group chat called “october order” involving PHAN, LUK, and SON NGUYEN. In the chat, order information placed on the site from customers nationwide was circulated amongst the group including names, addresses, and quantity of tablets. DAT QUOC NGUYEN provided

names with addresses and the number of tablets ordered per person. SON NGUYEN asked, “Only 3 today?” DAT QUOC NGUYEN replied, “Website is being gay.”

25. DAT QUOC NGUYEN and TRIEU NGHI NGUYEN HOANG were also both involved in a WhatsApp group chat called “ADD CONVO ONLY” beginning in September 2019 and continuing into October 2019 involving TYLER PHAM, PHAN, LUK, SON NGUYEN, and an additional person. During the chat, SON NGUYEN stated, “Dat plz take care of the add today,” “Me and Tyler busy playing our role.” SON NGUYEN then sent a digital image of what appeared to be the inside of a casino. TRIEU NGHI NGUYEN HOANG then wrote, “Lmao.” DAT QUOC NGUYEN replied, “I will take care of it when I get home.” LUK then said, “I can do the other part if you need help.” Several days later but in the same group chat, SON NGUYEN wrote, “Dat process the order today and send it out so Hon can create the labels etc. I forgot my laptop at home.” DAT QUOC NGUYEN later replied, “I thought u had alot of money on the addy wallet,” “for postage.” SON NGUYEN responded, “I do,” “No laptop,” “Forgot it at home.”

26. On October 10, 2019, DUONG THUY NGUYEN received a message from DAT QUOC NGUYEN which read, “Wtf u doing on here.” DUONG THUY NGUYEN replied, “Fml” “All i see i the same people.” DAT QUOC NGUYEN responded, “Welcome to the dark side. Congratulate u for taking the red pill.” On October 11, 2019, DUONG THUY NGUYEN received a message from TRIEU NGHI NGUYEN HOANG which read, “Wtf u on here for.” DUONG THUY NGUYEN replied, “Lol same reason as u.” TRIEU NGHI NGUYEN HOANG responded, “Lol [smiley face with tears emoji].”

TRIEU NGHI NGUYEN HOANG Amazon Purchases

27. As previously detailed above and with only one exception, the parcels that contained the controlled purchases of narcotics made by the undercover law enforcement officers were packaged in a clear re-sealable bag within a black mylar bag which was all inside a bubble mailer. Additionally, the labels appeared to be computer generated and printed labels that were adhered to each bubble mailer.

28. As part of the investigation, I reviewed records from Amazon.com Inc. pertaining to TRIEU NGHI NGUYEN HOANG. Based on my review of the records, I believe that TRIEU NGHI NGUYEN HOANG ordered 19 products between June 6, 2019 and August 20, 2019 that are consistent with the packaging used in the aforementioned undercover drug purchases. All of these purchases were shipped to a residence in Annandale, Virginia that was owned at the time by TRIEU NGHI NGUYEN HOANG and the ‘shipping name’ on each purchase was “TRIEU-NGHI HOANG.”

29. The following is a table of some of the aforementioned 19 products:

Date Ordered	Product Purchased	Cost
June 6, 2019	ROLLO label printer	\$169
June 10, 2019	10 rolls of four inch by six inch internet postage labels	\$48.99
June 11, 2019	150 black mylar bags	\$50.85
June 18, 2019	1000 clear re-sealable bags, two inch by three inch	\$10
June 19, 2019	500 bubble mailers, six inch by 10 inch	\$63.90
June 19, 2019	10 rolls of four inch by six inch internet postage labels	\$48.99
June 19, 2019	250 black mylar bags	\$84.75

Date Ordered	Product Purchased	Cost
June 25, 2019	1000 bubble mailers, six inch by 10 inch	\$127.80
August 14, 2019	1500 bubble mailers, six inch by 10 inch	\$191.70

Conclusion

30. Based on the foregoing, I submit that there is probable cause to believe that, from on or about May 2019 to on or about December 2019, within the Eastern District of Virginia and elsewhere, DAT QUOC NGUYEN and TRIEU NGHI NGUYEN HOANG did unlawfully, knowingly and intentionally combine, conspire, confederate, and agree with others, both known and unknown, to unlawfully, knowingly, and intentionally distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.



Donald August Mockenhaupt
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to in accordance with Fed. R. Crim. Proc. 4.1 by telephone on August 19, 2020.

John F.

Anderson

Digitally signed by John F.
Anderson
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The Honorable John F. Anderson
United States Magistrate Judge